

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA
GOEDINGHAUS,

Plaintiff(s),

vs.

TRAMMELL S. CROW, JR., DR. BENJAMIN
TODD ELLER, RICHARD HUBBARD, DR.
MELISSA MILLER, DR. JOSEPH BOLIN, DR.
SCOTT WOODS, DR. MRUGESHKUMAR
SHAH, MICHAEL CAIN, COE
JURACEK, PHILIP ECOB, H.J. COLE, TEXAS
RANGER CODY MITCHELL, KURT
KNEWITZ, PAUL PENDERGRASS, RALPH
ROGERS, ROBERT PRUITT,
SCOTT BRUNSON, CASE GROVER,
RICHARD BUTLER, MARK MOLINA,
MICHAEL HYNES, JR., SHAWN MAYER,
JADE MAYER, RCI HOSPITALITY
HOLDINGS, INC., INTEGRITY BASED
MARKETING, LLC, STORM FITNESS
NUTRITION, LLC, ULTRA COMBAT
NUTRITION, LLC, ECOLOFT HOMES LLC,
ELEVATED WELLNESS PARTNERS LLC,
DOE INDIVIDUALS 1–20, and DOE
COMPANIES 21–30

Defendant(s).

Case No.: 2:23-CV-00580-FB

**DEFENDANT BENJAMIN TODD
ELLER’S ANSWER AND
AFFIRMATIVE DEFENSES TO
PLAINTIFF’S AMENDED
COMPLAINT; and DEMAND FOR
JURY TRIAL**

Hon. Fred Biery

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant Benjamin Todd Eller (“Defendant”), without consenting to personal jurisdiction by the United States District Court for the Western District of Texas, and without waiving his defense that this Court specifically lacks personal jurisdiction over him, and hereby files this Answer and Affirmative Defenses to Plaintiffs’ Amended Complaint:

1. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
2. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
3. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
4. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
5. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
6. Defendant states that the allegations contained in this paragraph constitute legal conclusions and/or assertions of a jurisdictional basis for this action and therefore do not require a response. To the extent a response is deemed required, Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
7. Defendant denies the allegations in this paragraph.
8. Defendant denies the allegations in this paragraph.
9. Defendant denies the allegations in this paragraph.

10. Defendant denies the allegations in this paragraph.
11. Defendant denies the allegations in this paragraph.
12. Defendant denies the allegations in this paragraph.
13. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
14. Defendant admits only that he does not and cannot write prescriptions. Defendant denies the remaining allegations in this paragraph.
15. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
16. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
17. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
18. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
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57. Defendant states that the allegations contained in this paragraph constitute legal conclusions and/or assertions of a jurisdictional basis for this action and therefore do not require a response. Defendant denies that this Court has personal jurisdiction over him.
58. Defendant states that the allegations contained in this paragraph constitute legal conclusions and/or assertions of a jurisdictional basis for this action and therefore do not require a response. Defendant denies that this Court has personal jurisdiction over him.

59. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
60. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
61. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
62. Defendant admits only that he resides in the State of California and denies the remaining allegations in this paragraph.
63. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
64. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
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113. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
114. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.
115. Defendant admits only that he lived and worked in the State of California in 2012, provided business consulting to Chet Holmes International clients, including Defendant Rick Hubbard. Defendant denies the remaining allegations contained in this paragraph.
116. Defendant admits only he has a PhD, has taught and appeared on television, and denies the remaining allegations as an incomplete and inaccurate characterization of his professional background.
117. Defendant admits only to providing online commentary and writing for BabyFirst TV, and denies the remaining allegations as an incomplete and inaccurate characterization of his professional background.
118. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
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131. Defendant denies the allegations in this paragraph.

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136. Defendant denies the allegations in this paragraph.

137. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.

138. Defendant denies the allegations in this paragraph to the extent they refer to him, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and therefore denies them.

139. Defendant denies the allegations in this paragraph.

140. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.

141. Defendant lacks the knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and therefore denies them.

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The remaining allegations in the Amended Complaint constitute prayers for relief and therefor no responsive pleading is necessary. In the event that a responsive pleading is deemed necessary, Defendant denies the remaining allegations in the Amended Complaint and denies that Plaintiffs are entitled to any relief whatsoever.

AFFIRMATIVE DEFENSES

Any and all allegations in the Amended Complaint not hereinbefore otherwise answered are hereby generally and specifically denied. In addition, Defendant alleges the following separate and affirmative defenses as to the claims in the Amended Complaint:

1. The Amended Complaint, and this action, is subject to dismissal because the Court lacks personal jurisdiction over Defendant, and is without authority to render any judgment against him.
2. Some or all of claims set forth in the Amended Complaint are barred for failure to comply with the applicable statute of limitations.
3. Plaintiffs' damages, if any, were caused in whole or in part by Plaintiffs own failure to mitigate damages.
4. Plaintiffs' damages, if any, were caused in whole or in part by Plaintiffs' own conduct, and any damages, if awarded, should be diminished in proportion to the amount of fault attributable to Plaintiffs.

5. Plaintiffs' damages, if any, were caused in whole or in part by parties other than Defendant, and any damages, if awarded, should be diminished in proportion to the amount of fault attributable to those other parties.
6. Plaintiffs' damages, if any, should be reduced by any collateral source as required by law.
7. Plaintiffs lack standing to bring some or all of the claims set forth in the Amended Complaint.
8. Plaintiffs waited an unreasonably long time to file this action, which is barred by the doctrine of laches.
9. Plaintiffs are seeking to benefit from their own wrongdoing by filing this action, which is barred by the doctrine of unclean hands and/or *in pari delicto*.
10. To the extent that Plaintiffs' claims were previously adjudicated and barred by the doctrine of res judicata, transactional res judicata, and/or collateral estoppel.
11. Plaintiffs; claims are barred for failing to join an indispensable party to this litigation.

Defendant specifically reserves the right to assert additional affirmative defenses not set forth herein.

PRAYER FOR RELIEF

WHEREFORE, the Defendants pray as follows:

1. That Plaintiffs take nothing by reason of the Complaint and that judgment be rendered in favor of the Defendants, denying Plaintiffs any form of relief.
2. That Defendants be awarded attorney's fees and the costs of suit incurred in defense of this action, and for such other and further relief as the Court deems proper.

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JURY DEMAND

Defendant demands a jury trial.

DATED: December 18, 2023

CAMERON JONES LLP

/s/ Indira J. Cameron-Banks

Indira J. Cameron-Banks (appearing *pro hac vice*)

(Cal. State Bar 248634)

407 N. Maple Dr., Grnd 1, Beverly Hills, CA 90210

424-757.0585 | indira@cameronjones.law

Attorney for DEFENDANT

Benjamin Todd Eller

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of DEFENDANT BENJAMIN TODD ELLER'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S AMENDED COMPLAINT; and DEMAND FOR JURY TRIAL was served on counsel of record via CM/ECF on December 18, 2023.

/s/ Indira J. Cameron-Banks

Indira J. Cameron-Banks